

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	NO. 3-CR-15-70370
)	
V.)	STIPULATION AND (PROPOSED)
)	ORDER TO CONTINUE STATUS
)	CONFERENCE AND FOR
)	EXTENSION OF TIME UNDER
)	RULE 5.1 AND EXCLUSION OF
)	TIME UNDER THE SPEEDY
CARL M. FORCE)	TRIAL ACT
SHAUN W. BRIDGES,)	
Defendants.)	

The Defendants, Carl M. Force and Shaun W. Bridges, by and through their counsel, Ivan Bates, and Steven H. Levin and Craig S. Denney, respectively, and the United States hereby stipulate to a continuance of the status hearing date in this case to August 26, 2015, at 9:30 a.m. before the duty Magistrate. The Defendants and the United States agree that good cause exists to extend the time limits of Rule 5.1 to August 26, 2015. The parties also agree that time is appropriately excluded under 18 U.S.C. § 3161, the Speedy Trial Act between June 11, 2015 and August 26, 2015.

The parties agree that good cause exists, taking into account the public interest in the prompt disposition of criminal cases, to extend the time for the status hearing to August 26, 2015, to allow the parties time to investigate the matter further and to discuss a potential resolution of this matter. The government has provided a large volume of discovery in the weeks prior to the instant stipulation, and the parties are engaged in productive discussions to possibly achieve a resolution of the matter. The parties also agree that an exclusion of time is appropriate under the Speedy Trial Act between June 11, 2015, and August 26, 2015, for purposes of continuity of counsel and effective

preparation of counsel, in order to provide defense counsel with adequate time to review the matter conduct and investigation, and consult with the Defendants. In addition, the parties agree to exclude for this period of time any time limits applicable under 18 U.S.C. § 3161. The parties represent that granting the continuance, in order to provide defense counsel adequate time to review the matter, conduct additional investigation, and consult with the Defendants, is necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting such a continuance outweigh the best interests of the public and the Defendants in a speedy trial 18 U.S.C. §(3161(h)(7)(A).

SO STIPULATED:

Dated: June 10, 2015

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)	THE SPEEDY TRIAL ACT
CARL M. FORCE)	
SHAUN W. BRIDGES,)	
Defendants.)	

Based upon the representation of counsel and for good cause shown, the Court finds that good cause exists, taking into account the public interest in the prompt disposition of criminal cases, for extending time under Rule 5.1 for a status hearing to August 26, 2015. The Court further finds that good cause exists for a continuance of the status hearing date to August 26, 2015. The Court finds that failing to exclude the time between June 11, 2015, and August 26, 2015, would unreasonably deny the defendants and counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of the justice served by excluding the time between June 11, 2015, to August 26, 2015, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial.

Therefore, IT IS HERBY ORDERED that:

1. The status hearing date is extended to August 26, 2015;
 2. good cause exists to extend time for the status hearing under Rule 5.1 to August 26, 2015; and
 3. the time between June 11, 2015, and August 26, 2015, shall be excluded from computation under the Speedy Trial Act.
- 18 U.S.C. § 3161(h)(7)(B)(iv)

DATED: _____

HON. JACQUELINE SCOTT CORLEY
United States Magistrate Judge